

<PROCEEDING> Docket No. 98-143
<DATE> October 15, 1998

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Paragraph 12: While I agree that the Novice Class license represents an undue processing load on both the VE structure and the FCC database, I do not agree with the elimination of the Novice sub bands on 80,40,15, and 10 meters. I believe that there is merit in designating a portion of the band as "slow speed telegraphy" for those operators who are seeking other operators with which to practice their telegraphy skills. Many of us who have successfully passed their 13 WPM code test are more comfortable at slower speeds and seek out other operators who wish to establish contacts at slower speeds, and the slow speed portion of the bands provide that opportunity. Furthermore, there are many amateur operators who seek out new licensees in order to give them some of their first contacts, as this serves to remind them of the pleasure they experienced in their first slow speed contact.

Paragraph 13. I agree that the Novice and Technician Plus license should be phased out. I do not, however, support the ARRL position whereby operators who have passed the 5WPM code test should be given full HF operating privileges. I would not oppose lowering the entry level speed to as low as 10 WPM, but no lower unless the commission can determine some other method of demonstrating commitment to gain worldwide HF privileges. If one monitors the amateur bands for any length of time, they discover that the over modulated, deviating, splattering signals emanate, for the most part, from those countries where licensing requirements have been lowered. If the FCC chooses to reduce the effort required to obtain an amateur license, the same problem will occur within the U.S., which given the large number of amateurs in the U.S. could potentially cause interference on a world wide basis.

Paragraph 15. I agree completely. In addition, there is no need to issue separate licenses for radio clubs.

Paragraph 17 and 18. ARRL's petition RM-9150 is a clear example of the ARRL's continued effort to both perpetuate its existence as well as become the sole voice for the amateur community. There are many amateurs who do not belong to the ARRL, and the ARRL does not necessarily speak for the amateur community at large. Giving the amateur auxiliary direct access to the CALJ would increase the position of the ARRL substantially.

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The vast majority of radio amateurs are considerate, technically competent individuals. The malicious interference problems are caused by a very small number of individuals. In my opinion, the numbers of amateurs who cause problems are in direct proportion with the number of licenses issued. In other words, for every 5,000 amateur licenses issued, there will be a small percentage who abuse their privilege to use the spectrum and do not respect the rights of their fellow amateurs. **The problem has increased in the last few years because it has become easier and easier to get a license and the number of amateurs has increased substantially.** Reducing license requirements while strengthening enforcement can only be a losing battle for the FCC. For the ARRL, however, this will insure a steady flow of new members, increased sales of advertising in their magazine, and greater stature as the primary voice for radio amateurs.

A more sensible approach would be to determine the cost of increasing the size of the enforcement arm of the FCC to a more reasonable size, and pass the cost along to the amateur community in the form of higher license renewal fees. This would result in the entire amateur branch of the FCC being primarily funded by the amateur community, as opposed to the taxpayers at large (who should contribute a percentage based on amateur service to FEMA and other agencies in time of disaster).

Paragraph 24. This is a very difficult issue, and a highly emotional one. While I agree that Morse code is not a requirement for an amateur license given the current proliferation of more efficient digital communications modes, some method of demonstrating commitment must be maintained. Therefore, I suggest 10 WPM for General and Advanced (Class B and C in the new structure) and 20 WPM for Extra (Class A). This would satisfy the who feel that 13 WPM is too difficult, while keeping the Extra class license as a reward for extra effort. One minute of solid copy is certainly a greater proof of ability than answering five multiple-choice questions.

Paragraph 26 and 27. The VE system has proven itself capable of administering the question pools, and I believe that allowing the VE's more authority in determining the appropriate questions will reduce the burden on the FCC. I do not believe, however, that the current practice of publishing the question pools should be continued, unless the number of examination questions is substantially increased.

The purpose of the examination is to verify that the operator has a general working knowledge of operating procedures, understands both RF and electrical safety, is capable of providing meaningful support if necessary in times of regional or national emergency, grasps the fundamentals of good engineering practice as they apply to station construction, and understands the commission's rules and regulations as they apply to the amateur service. **The purpose of the exam is not to test the applicant's ability to memorize the answers to questions.**

An unfortunate result of publishing the question pool has been the proliferation of one day license classes given by commercial enterprise where the prospective applicants are drilled on the question pool for eight hours and given the exam immediately thereafter. These individuals are readily identified on the air, as they have been given no training on actual operating practice what so ever. Specific examples can also be found in the amateur magazines which feature a "question and answer" column; many of the questions submitted by new licensee's clearly demonstrate that they have not been given sufficient training in the basics of operating practice and safety.

While this final comment is outside the scope of the specific comments requested by the commission, I believe that the FCC should give serious consideration to adopting a form of the licensing system used by the FAA for private pilots. In other words, an applicant would be required to show documented proof of "dual" operation with a qualified operator, which would result in some actual operating experience before the license was granted. The examination would consist of both a written and oral component, with the written component being focused primarily on theory and the oral component focused on the correct action to take in specific situations.

To: The Secretary
 Federal Communications Commission
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 Washington, DC 20554

OCT 29 1998

c.c.: Chairman William E. Kennard
 Commissioner Susan Ness
 Commissioner Michael Powell
 Commissioner Harold Furchgott-Roth
 Commissioner Gloria Tristani

FCC MAIL ROOM

Before the
 Federal Communications Commission

In the Matter of WT Docket No. 98-143: *Restructuring of the Amateur Service, Part 97*

Summary: Three classes of licenses and one level of code proficiency at 5 words per minute (wpm) are the two most essential components that the FCC should include in their final proposal for "Restructuring of the Amateur Radio Service." These provisions, if adopted, would have the following immediate effect of: (a) Reducing the work load of the FCC -- three licenses in place of six, (b) Streamlining the amateur testing program relevant to current and future technology and (c) Facilitating the growth of the amateur service.

Provision 1. Number of License classes:

In my view the FCC's proposal does not go far enough toward streamlining and modernizing amateur radio. The proposed four classes of licenses are simply too many. I suggest you eliminate the following classes -- Novice, Tech Plus, and Advanced and retain the following classes -- Technician, General, and Extra. Current Novice and Technician Plus licensees should be "grandfathered" to General class operators and the current Advanced class licensees should be "grandfathered" as Extra class operators.

The Technician class should become the sole entry class license. It would grant VHF privileges and entail a basic written test, but no Morse requirement. The General class license would grant full HF privileges and would entail a written test and a 5 wpm Morse code requirement. The Extra class license would entail a comprehensive written examination and signify superior achievement and comprehensive knowledge of all areas of theory and amateur practice -- however, it would not require an additional level of Morse code proficiency. Frequency allocations can continue to reflect differences in the license classes in an appropriate fashion as they currently do. This system would put the US in alignment with other CEPT countries who, at the most, have only three license classes -- two HF and one VHF.

Provision 2. Morse Code Testing at 5 wpm Maximum.

I support the FCC's suggestion to replace the Morse code requirement with more relevant written testing on various aspects of current and developing technology. Today, Morse code is merely one of many modes of communication and there is no reason to single it out as particularly significant or important. A single 5 wpm Morse test will also remove the necessity of processing and issuing waivers for the handicapped. Eventually, all Morse testing should be eliminated consistent with US obligations under International treaties.

These suggestion, if adopted, would simplify the licensing processes and ensure, into the twenty-first century, the continuing history of amateur radio service to the country

Respectfully submitted,

George R. Harrop WSTER

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